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January 12, 2018

By ECFS

Marlene H. Dortch
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte* Presentation of American Cable Association, GN Docket No. 17-183

Dear Ms. Dortch:

On January 10, 2018, Ross J. Lieberman, Senior Vice President, Government Affairs, American Cable Association (“ACA”), Mary Lovejoy, Vice President of Regulatory Affairs, ACA, Pantelis Michalopoulos, Steptoe & Johnson LLP and the undersigned met with representatives from the International Bureau, the Wireless Telecommunications Bureau and Office of Engineering and Technology to discuss the above-referenced proceeding. Representatives from the International Bureau included Thomas Sullivan; Jose Albuquerque; Jennifer Gilsenan; Jian Schlichting; Michael Mullinix; Robert Nelson; Christopher Bair; and Kal Krautkramer (by telephone). Representatives from the Wireless Telecommunications Bureau included Becky Schwartz; Matthew Pearl; Peter Daronco; Blaise Scinto; Ariel Diamond; Meaghan Ryan; and Dana Shaffer (by telephone). Representatives from the Office of Engineering and Technology included Michael Ha; Bahman Badipour; Brian Butler; Jamison Prime; and Nicholas Oros.

ACA discussed the need for the Commission to update its database to reflect the number of current C-band receive-only earth stations in operation. ACA reiterated its estimate that the receive-only earth stations of as many as 90 percent of the 3,000 systems operated by its members are unregistered. The Notice of Inquiry similarly suggests there are thousands more of unregistered receive-only earth stations throughout the country. One reason for these large numbers is the burdens associated with registration: the \$435 filing fee and the cost of commissioning an independent frequency coordinator to conduct a coordination study. Inducing thousands of small businesses to commit to a \$1,000 expenditure, plus an expenditure of other resources, would likely be an impediment to obtaining information on currently operational C-band receive-only earth stations.

ACA therefore believes that a streamlined process for registering existing C-band receive-only earth stations is necessary and appropriate as part of the Commission's efforts to collect comprehensive information on the use of the C-band. ACA looks forward to working with the Commission to resolve the issue of significant under-registration of receive-only earth stations in an efficient and realistic manner.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Georgios Leris", written over a horizontal line.

Georgios Leris
Counsel for American Cable Association

CC: Meeting participants